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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,) 2:13-CR-439-KJD-VCF
16 Plaintiff,)
17 v.) **Stipulation to Enter the Exhibits
18 SEAN FINN,) Referenced in the Motion for Forfeiture,
19 Defendant.) ECF No. 575**
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The United States of America and Sean Finn through his counsel, Dustin R. Marcello, agree to the following:

1. The Exhibits hand delivered on or about August 5, 2020, and listed in the Index of Exhibits attached hereto and incorporated herein as if fully set forth herein, are admitted as fact and are admitted as evidence.

2. Each party reserves the right to argue the significance of the admitted exhibits.

3. Each party acknowledges and warrants that its execution of the Stipulation is free and is voluntary.

4. The Stipulation contains the entire agreement between the parties.

5. Except as expressly stated in the Stipulation, no party, officer, agent, employee, representative, or attorney has made any statement or representation to any other party, person, or entity regarding any fact relied upon in entering into the Stipulation, and no party, officer, agent, employee, representative, or attorney relies on such statement or representation in executing the Stipulation.

1 6. The persons signing the Stipulation warrant and represent that they have full
2 authority to execute the Stipulation and to bind the persons and/or entities, on whose behalf
3 they are signing, to the terms of the Stipulation.

4 7. This Stipulation shall be construed and interpreted according to federal
5 forfeiture law and federal common law. The jurisdiction and the venue for any dispute
6 related to, and/or arising from, this Stipulation is the unofficial Southern Division of the
7 United States District Court for the District of Nevada, located in Las Vegas, Nevada.

8 8. This Stipulation shall not be construed more strictly against one party than
9 against the other merely by virtue of the fact that it may have been prepared primarily by
10 counsel for one of the parties; it being recognized that both parties have contributed
11 substantially and materially to the preparation of this Stipulation.

12 IT IS HEREBY CERTIFIED, pursuant to 28 U.S.C. § 2465(a)(2), that there was
13 reasonable cause for the seizure and forfeiture of the property.

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15 DATED: August 28, 2020

DATED: August 28, 2020

16 PITARO & FUMO

NICHOLAS A. TRUTANICH
United States Attorney

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18 /s/ Dustin R. Marcello
DUSTIN R. MARCELLO
19 Counsel for Sean Finn

/s/ Daniel D. Hollingsworth
DANIEL D. HOLLINGSWORTH
Assistant United States Attorney

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22 IT IS SO ORDERED:

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26 UNITED STATES DISTRICT JUDGE

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28 DATED: 9/1/2020

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8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

10	UNITED STATES OF AMERICA,	2:13-CR-439-KJD-VCF
11	Plaintiff,	Index of Provided Discovery Exhibits and
12	v.	Additional Exhibits* as of August 5, 2020
13	SEAN FINN,	
14	Defendant.	
15	Exhibit A	Grant Liverett Escrow Receipt
16	Exhibit A-1	Grant Liverett Incoming Fed Wire to CES Union Bank in the amount of \$225,000
17		
18	Exhibit A-1-a	CES Union Bank Statement with \$225,000 incoming wire transfer
19	Exhibit A-1-b	CES Outgoing Wire Transfer of \$188,900 and CES Union Bank Statement
20	Exhibit A-1-c	CES Outgoing Wire Transfer of \$15,000 and CES Union Bank Statement
21	Exhibit A-1-d	CES Outgoing Wire Transfer of \$4,500 and CES Union Bank Statement
22	Exhibit A-1-e	CES Outgoing Wire Transfer of \$17,500 and CES Union Bank Statement
23	Exhibit A-1-f	M.Y. Consultants BOA Statement with \$188,900 incoming wire transfer
24	Exhibit A-1-g	Anthony Brandel BOA Statement with \$15,000 incoming wire transfer
25	Exhibit B.....	Grant Liverett Joint Venture Agreement
26	Exhibit C	Grant Liverett Joint Escrow Instructions
27	Exhibit C-1.....	Anthony Brandel email to Release the Funds for Grant Liverett's Escrow
28	Exhibit D	Natalie Allen Escrow Instructions

1 Exhibit D-2 Letter from STI Family Office to M.Y. Consultants dated 10/22/09
2 Exhibit E..... Natalie Kristina Allen Crosby Joint Venture Agreement
3 Exhibit E-1 Letter from Martin Schlaepfer to M.Y. Consultants dated 10/20/09
4 Exhibit E-2 Natalie Kristina Allen Crosby - Joint Venture Agreement
5 Exhibit E-3 Natalie Kristina Allen Crosby – Victim Impact Statement
6 Exhibit F..... Jill Schrecongost Escrow Receipt
7 Exhibit F-1 Letter from Jill Schrecongost to Chicago Title to Release funds to CES
8 Exhibit F-4 Jill Schrecongost Fed Wire of \$300,000 to CES Union Bank
9 Exhibit F-4-a ... CES Incoming Wire Transfer for \$300,000 and CES Union Bank Statement
10 Exhibit F-4-b CES Outgoing Wire Transfer of \$286,300 and CES Union Bank Statement
11 Exhibit F-4-c CES Outgoing Wire Transfer of \$10,000 and CES Union Bank Statement
12 Exhibit F-4-d M.Y. Consultants BOA Statement with \$286,300 incoming wire transfer
13 Exhibit F-4-e Anthony Brandel BOA Statement with \$10,000 incoming wire transfer
14 Exhibit F-4-f..... CES check for \$3,700, escrow fees for 5642-AH
15 Exhibit F-5 Letter from M.Y. Consultants to release escrow
16 re: Jill Schrecongost dated 7/19/10
17 Exhibit F-6 Email from Jill Schrecongost to James Warras dated 4/27/11
18 Exhibit F-7 Union Bank Wire Transfer 7/20/10
19 Exhibit G Jerry Hanks Victim Impact Statement
20 Exhibit G-1 Jerry Hanks Joint Escrow Instructions
21 Exhibit G-2 Jerry Hanks Fed Wire to Union Bank
22 Exhibit G-2-a CES Union Bank Statement with \$100,000 incoming wire transfer
23 Exhibit G-2-b ... CES Incoming Wire Transfer of \$150,000 and CES Union Bank Statement
24 Exhibit G-2-c.....CES Outgoing Wire Transfer of \$131,500 and CES Union Bank Statement
25 Exhibit G-2-d CES Outgoing Wire Transfer of \$100,000 and CES Union Bank Statement
26 Exhibit G-2-e..... CES Outgoing Wire Transfer of \$15,000 and CES Union Bank Statement
27 Exhibit G-2-f..... M.Y. Consultants BOA Statement with \$131,500 Incoming Wire Transfer
28 Exhibit G-2-g Allen Smith BOA Statement with \$100,000 Incoming Wire Transfer

1 Exhibit G-2-h Anthony Brandel BOA Statement with \$15,000 Incoming Wire Transfer
2 Exhibit G-3 Disbursements from Union Bank related to Jerry Hanks
3 Exhibit G-4 Anthony Brandel BOA Statement re: \$15,000 related to Jerry Hanks
4 Exhibit G-5 M.Y. Consultants BOA Statement re: \$131,500 related to Jerry Hanks
5 Exhibit G-6 Allen Smith BOA Statement re: \$100,000 related to Jerry Hanks
6 Exhibit G-7 J&H Capital Chase Bank Statements with incoming wires from Jerry Hanks
7 Exhibit G-7-a Viola Wright Affidavit of JP Morgan Chase Bank records
8 Exhibit H Eric Krupa Escrow Receipts
9 Exhibit H-1 Eric Krupa Wires to CES re: \$50,000 and \$380,000
10 Exhibit H-1-a..... CES Union Bank Statement with \$380,000 and \$50,000 Incoming Wires
11 Exhibit H-1-b CES Outgoing Wire Transfer of \$299,700 and CES Union Bank Statement
12 Exhibit H-1-c..... CES Outgoing Wire Transfer of \$200,000 and CES Union Bank Statement
13 Exhibit H-1-d CES Outgoing Wire Transfer of \$25,000 and CES Union Bank Statement
14 Exhibit H-1-e..... M.Y. Consultants BOA Statement with \$299,700 Incoming Wire Transfer
15 Exhibit H-1-f Allen Smith BOA Statement with \$200,000 Incoming Wire Transfer
16 Exhibit H-1-g..... Anthony Brandel BOA Statement with \$25,000 Incoming Wire Transfer
17 Exhibit K Disbursement of Illegal Proceeds
18 Exhibit L..... SEC's schedule of illegal proceeds deposits into Brandel's account
19 Exhibit M..... SEC's transcripts of Brandel's testimony
20 Exhibit 1412 Funds sent from MY Consultants to Sean Finn

21 *Admitted Trial Exhibits are not provided here as they have been previously provided.

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